

From: swampy10@verizon.net [mailto:swampy10@verizon.net]
Sent: Thursday, April 05, 2012 11:13 PM
To: Baskin, Kathleen (EEA)
Subject: Sustainable Water Management Initiative (SWMI) "Framework"

Kathleen Baskin, P.E.
Director of Water Policy and Planning
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA

Dear Ms. Baskin,

We are writing on behalf of the Headwaters Stream Team of the Ipswich River Watershed Association in response to the Sustainable Water Management Initiative (SWMI) "Framework" proposal of February 3, 2012. The Headwaters Stream Team was formed in 1999 under the State Riverways Program based in the mindset that citizen involvement on the local level was one of the most effective ways to protect the Commonwealth's rivers.

We first wish to make you aware that we along with our membership appreciate the tremendous effort that state staff and others have dedicated to the SWMI process. The scientific findings and development of ecologically-based streamflow criteria represent a major step forward. However, serious weaknesses in the proposed SWMI Framework undermine its credibility, negate its effectiveness and thwart truly sustainable water management. These deficiencies must be addressed.

The goal of sustainable water management should be to use water wisely, so that our rivers, streams and wetlands have enough clean water to support healthy populations of native fish. Protecting the rivers that are healthy, and restoring those that are not, should be explicit goals of SWMI.

It is no secret that where there is water life abounds. The headwaters / wetland streams are no exception. The shallow vegetated waterways are essential fish nurseries and home to a vast and diverse ecosystem. These systems are dependent on groundwater which maintain flows during the summer months. The Town of Wilmington, based on their own documentation, pumped Maple Meadow Brook (MMB), a major headwater stream, dry for thirty plus years. We were never able to document fish kills because there were no fish left. Since the shut down of the MMB aquifer in 2003, due to contamination, the brook has not dried out - even in the driest years. Lubbers Brook another major headwater stream is now pumped dry virtually every year. We have attached several photos from 2010, a "non-drought year". If you look closely at one of the photos (jpg. 6782) you will notice the difference in the size of these fish, small to very very small, all babies. A new generation is lost year after year. Eventually it will be like MMB, there will be no fish at all. The irony is astounding. If these fish were killed by a chemical spill or illegal discharge the town would be in violation of the law. But because these fish were killed by a water withdrawal or "registered" permit it is acceptable? So like oil the permits are a death sentence. Considering the entire brook

for miles virtually loses all life within it, a stark contrast emerges between the reality, the ramifications of such and the intent of the permit and the department who's charge is it to protect these resources under the Water Management Act. There should be no contrast between the task and the outcome. This contrast indicates failure. It is obvious that here in the Headwaters of the Ipswich River the current permits do not allow for sustainability now, under the new proposals it could be worse. We believe ensuring that the SWMI proposal addresses the issues of sustainability is not something out of the realm and is not an unreasonable request. It certainly is an achievable and absolutely essential end point, especially when considering the unknowns of climate change.

Currently, about 20% of Massachusetts sub-basins are seriously degraded by water withdrawals, and another 16% are vulnerable to becoming degraded if they were subjected to increased withdrawals. Yet the SWMI Framework proposes safe yield withdrawal limits that are several times higher than the latest science indicates is safe for fish; exempts some permitted withdrawals from having to fully minimize and mitigate the impacts of their withdrawal; and allows "non-essential" water use when flows are below safe levels. This is not sustainable water management.

Unfortunately, nothing in the SWMI proposal will prevent vulnerable rivers, streams and wetlands from falling below safe levels or being pumped dry; this is unacceptable. We must seize this once-in-a-generation opportunity to begin a process of gradual restoration of degraded rivers, streams and wetlands. We should start by establishing protective safe yield withdrawal limits consistent with the latest research. If the new proposals do not eliminate or prevent damage to the environment then more work needs to be done to solve this problem.

Thank you for your time, consideration, and the opportunity to comment on such an important issue facing our Commonwealth and the future sustainability of its rivers.

Sincerely,

Suzanne M. Sullivan
Co-Chair Headwaters Stream Team
60 Lawrence St
Wilmington, Ma

and

Martha K Stevenson
Co-Chair **Headwaters** Stream Team
7 Chandler Rd
Wilmington, Ma



